

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

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In Re:

**LTL MANAGEMENT, LLC,<sup>1</sup>**

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Honorable Michael B. Kaplan

**APPLICATION FOR ORDER SHORTENING TIME AND CERTAIN OTHER RELIEF**

The applicant, the Official Committee of Talc Claimants (the “**TCC**” or the “**Committee**”) in the above-captioned case of LTL Management, LLC (the “**Debtor**” or “**LTL**”), by and through the Committee’s counsel, having filed substantially contemporaneously with this Application (i) the *Reply in Support of the Motion of the Official Committee of Talc Claimants to Dismiss Second Bankruptcy Petition of LTL Management, LLC* (the “**TCC Reply**”), and (ii) the *Motion to Seal the Redacted Portions and Exhibits of the Reply in Support of the Motion of the Official Committee of Talc Claimants to Dismiss Second Bankruptcy Petition of LTL Management, LLC* (the “**Motion to Seal**”<sup>2</sup>), hereby requests that the time period required by D.N.J. LBR 9013-2(a) be shortened pursuant to Fed. R. Bankr. P. 9006(c)(1), and that an order be entered substantially in the form submitted herewith (the “**Scheduling Order**”), for the reasons set forth below:

1. **For the reasons set forth below, the Committee respectfully requests that the hearing on the Motion to Seal be scheduled for June 27, 2023, at 9:00 a.m., or as soon thereafter as the Court’s calendar permits.**

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<sup>1</sup> The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

<sup>2</sup> A redacted version of the TCC Reply has been filed immediately prior to the filing of the Motion to Seal. An unredacted version of the TCC Reply is being filed immediately after the filing of the Motion to Seal in accordance with this Court’s procedures for electronically requesting that a document be sealed (*see* [Process to Electronically Request that a Document be Sealed | United States Bankruptcy Court - District of New Jersey \(uscourts.gov\)](https://www.uscourts.gov/process-to-electronically-request-that-a-document-be-sealed)).

2. The TCC Reply sets forth relevant preliminary and background matters which are incorporated herein by reference.

3. On April 24, 2023, the Committee filed a motion to dismiss the Debtor's second bankruptcy filing for cause [Docket No. 286] (the "TCC Motion to Dismiss"). Ten additional parties, including the Office of the United States Trustee [Docket No. 379] and Ad Hoc Committee of States [Docket No. 352], have also filed motions to dismiss this Chapter 11 case for cause (collectively, with the TCC Motion to Dismiss, the "Motions to Dismiss").<sup>3</sup>

4. On May 26, 2023, the Debtor and the Ad Hoc Committee of Supporting Counsel each filed Omnibus Objections to the Motions to Dismiss (respectively, Docket Nos. 614 and 613).

5. A trial on the Motions to Dismiss has been scheduled for June 27 thru June 30, 2023.

6. By this Application, the Committee respectfully requests that the hearing on the the Motion to Seal be scheduled on June 27, 2023, at 9:00 a.m., or as soon thereafter as the Court's calendar permits.

7. Reduction of the time period requested by this Application is not prohibited under Fed. R. Bankr. P 9006(c)(2).

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<sup>3</sup> Additional filings in support of dismissal include Docket Nos. 335, 346, 352, 358, 384, 473, 480, and Adv. Pro. No. 23-01092, Docket Nos. 117, 118.

**WHEREFORE**, the Committee respectfully requests that this Court (i) grant the Application, (ii) enter the form of order substantially in the form submitted herewith, and (iii) grant such other and further relief as it deems necessary and appropriate.

Dated: June 22, 2023

**GENOVA BURNS LLC**

By: /s/ Daniel M. Stolz

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